

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Valerie N. Jones	<u>Debtor</u>	CHAPTER 13
BANK OF AMERICA, N.A,	<u>Movant</u>	
vs.		NO. 18-13620 ELF
Valerie N. Jones	<u>Debtor</u>	
William C. Miller Esq.	<u>Trustee</u>	11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearages referenced in the motion have been cured, and Debtor(s) is/are current on post-petition loan payments through February 2019.
2. Debtor(s) shall maintain post-petition monthly loan payments due to Movant going forward, beginning with the payment due March 22, 2019 in the amount of \$214.83.
3. In the event that the payments under Section 2 above are not tendered, the Movant shall notify Debtor(s) and Debtor(s) attorney of the default in writing and the Debtor(s) may cure said default within FIFTEEN (15) days of the date of said notice. If Debtor(s) should fail to cure the default within fifteen (15) days, the Movant may file a Certification of Default with the Court and the Court shall enter an Order granting the Movant immediate relief from the automatic stay, under which the stay provided by Bankruptcy Rule 4001(a)(3) is waived.
4. The stay provided by Bankruptcy Rule 4001(a)(3) is waived with respect to any Court Order approving of this stipulation and/or ordering relief per the terms agreed upon herein .
5. If the case is converted to Chapter 7, the Movant shall file a Certification of Default with the court and the court shall enter an order granting the Movant relief from the automatic stay.

6. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

Date: March 25, 2019

By: /s/ Rebecca A. Solarz, Esquire
Attorney for Movant

Date: March 27, 2019

/s/ Patricia M. Mayer, Esquire
Patricia M. Mayer, Esquire
Attorney for Debtor

Date: 3/27/19

William C. Miller, Esquire
William C. Miller, Esquire
Chapter 13 Trustee
NO OBJECTION
*without prejudice to any
trustee rights or remedies.

Approved by the Court this _____ day of _____, 2019. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Eric L. Frank